

TRUCKEE RIVER TMDL EXEMPTION

Purpose

Total Maximum Daily Load (TMDL) discharge restrictions are in place on the Truckee River for total dissolved solids (TDS), total nitrogen and total phosphorous. A significant portion of the TDS TMDL has not yet been assigned to load allocations (LA) or wasteload allocations (WLA) and likewise remains available. Therefore, only nitrogen and phosphorous are addressed herein.

This document would set a threshold for evaluation of the daily loading of total nitrogen and total phosphorous from small discharges which are considered to be “de minimis”. This approach will provide a means for exempting small discharges from the requirement to obtain a WLA. Assigning WLAs and revising the TMDLs for every small NPDES permittee would be a large workload burden on NDEP staff with minimal or no environmental benefit.

Background

Existing TMDLs for the Truckee River at the Lockwood monitoring station are as follows:

Total Nitrogen: 1,000 lbs/day
Total Phosphorous: 214 lbs/day

Existing Waste Load Allocations and the non-point source Load Allocation are as follows:

Facility	Nitrogen LA/WLA	Phosphorous LA/WLA
Non-Point Sources (LA)	450 lbs/day	75.25 lbs/day
Truckee Meadows Water Reclamation Facility (WLA)	500 lbs/day Annual Average	134 lbs/day
Vista Canyon Group (WLA)	16.7 lbs/day	4.75 lbs/day
City of Sparks, Sparks Marina Park (WLA)	33.3 lbs/day	No IWLA
Total:	1,000 lbs/day	214 lbs/day

Proposed Exemptions to TMDLs and WLAs

If a discharge meets the following criteria, it will be exempted from a TMDL analysis:

Total Nitrogen: <1.0 lb/day
Total Phosphorous: <1.0 lb/day

The total daily load from permits which are issued under this exemption will be tracked in order to determine the portion of the non-point source allocation that is being used in this manner.

Rationale

Assigning 10% of the Load Allocation to these de minimis discharges could result in total permitted de minimis loads of:

Total Nitrogen:	45.0 lbs/day
Total Phosphorous:	7.5 lbs/day

The Truckee River is known to be nitrogen limited, and assigning only 10% of the non-point source load allocation to this use is considered conservative. Studies conducted by U.C. Davis under contract by the Pyramid Lake Paiute Tribe concluded that Pyramid Lake is not phosphorous limited and the role of phosphorous in the river is uncertain; therefore, assigning 10% of the non-point source load allocation is also considered conservative.

This policy will be re-evaluated when the loads permitted from these individually exempted permits total 45 lbs/day for total nitrogen and 7.5 lbs/day for total phosphorous.